REMARKS

The present application includes claims 35-41, 44-52, 54, 60-66 and 68-80. Claims 35, 51, 54 and 60 were amended. Claims 53, 55 and 67 were cancelled.

112 rejections

Claim 35 was rejected under 35 USC 112, first paragraph, as failing to comply with the written description requirement. The Examiner stated that the specification does not support the limitation: "first input signals each ... associated with all the letters of an alphabet".

Claim 35 was rejected under 35 USC 112, second paragraph, as being indefinite. The Examiner asked how each first input signal can be associated with all the letters of an alphabet.

Applicant respectfully traverses these rejections and will discuss them together with respect to claim 35, as they are related and depend on the same set of facts.

Claim 35 does not require that each first input signal be associated with all the letters of an alphabet, but rather that each first input signal is associated with a group of symbols such that together the first signals are associated with all the letters of an alphabet of a language. While this was clear from the previously presented claim, claim 35 is amended to further clarify this point. This limitation finds support for example in Figs. 8 and 47e.

Claim 36 requires "a second input unit adapted to receive second input signals corresponding to the letters of the alphabet". Applicant respectfully submits that this does not contradict claim 35, as each letter can be associated with both a

first signal and a second signal, as described, for example, on page 38, lines 4-5 of the specification.

Claim 76 was rejected for lack of antecedent for "the place". The claim was amended to state: "a place".

In view of these amendments and remarks, withdrawal of these rejections is respectfully requested.

103 rejections

Claims 35-41, 44-55 and 60-80 were rejected under 35 USC 103(a) as being unpatentable over King et al. (U.S. Patent No. 6,011,554) in view of Goren (U.S. Patent No. 7,190,351).

In response, claim 35 is amended to include a limitation similar to that of claim 53. Specifically, claim 35 now requires:

"a plurality of keys arranged in two groups, ... such that a user can touch all the keys of each group concurrently with a single finger, in a manner which allows selectively actuating each of the keys by the finger."

In the rejection of claim 53, the Examiner acknowledged that this is not taught by King or Goren, but stated that "it would have been obvious ... that the size of the keys is an obvious choice of design."

Applicant respectfully disagrees. The above limitation cannot be met merely by changing the size of the keys, as small keys will probably not allow "selectively actuating each of the keys by the finger", unless specifically designed to allow such actuation.

The importance of this feature is discussed on page 225, lines 6-11, of the specification:

"This permits to not remove (or rarely remove) the fingers from the keys during text entry and therefore a user knows which key to press without looking at the keypad. This permits fast typing even while said user is in motion. It is understood that for this purpose, the size of the keys, the distance between them, and other parameters such as physical characteristics of said keys, may be such that to optimize the above-mentioned procedure."

Independent claim 60

Claim 60 was amended to require "wherein the plurality of keys associated with all the letters of the alphabet are arranged such that a user can touch all the keys concurrently with two fingers, in a manner which allows selectively actuating each of the keys by one of the two fingers".

As discussed above regarding claim 35, this is not taught or suggested by King or Goren.

Dependent claims

The dependent claims are allowable at least by the virtue of their parent claims. Nonetheless, at least some of the dependent claims add further patentability over claim 35.

Claim 40, for example, requires four keys, each key being used to generate one of the first input signals, the four keys together associated with all the letters of the alphabet of the language.

The Examiner stated that the total number of keys associated with the letters of the alphabet is an obvious choice of design.

Applicant respectfully disagrees. The problem of entering text in small devices which do not have room for a full scale keyboard is an open issue for which thousands of suggestions have been made. The number of keys used to represent all the letters of the alphabet has important implications on the chances of guessing words by the word predictive system, on the sizes of the keys and their arrangement, as well as other issues. Therefore, the requirement of claim 40 cannot be considered a mere design choice.

Conclusion

Applicant respectfully requests reconsideration and withdrawal of the outstanding rejections of record. Applicant respectfully submits that in view of the above amendments and arguments the claims are allowable. Allowance of the application is respectfully awaited. If, however, the Examiner does not see fit to allow the claims, applicants respectfully request, following the provisions of MPEP 713.01, that the Examiner notify applicant's agent after he has considered the effect of the applicant's current response so that a telephone interview between the Examiner and applicant's agent can be arranged before a further action is issued. Applicant is of the opinion that such a telephone interview can expedite the case to final action. The undersigned can be reached at 202-628-5197.

Respectfully submitted,

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